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September 26, 2001

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: CC Docket Nos. 96-45 and 00-256

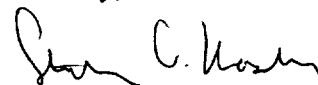
Dear Ms. Salas:

On September 25, 2001, Ben Dickens of Blooston, Mordkofsky, Jackson and Dickens, Lisa Zaina of Wallman Strategic Consulting, LLC and I met with Commissioner Kevin Martin and his legal advisor Samuel Feder to discuss the above-captioned matter. Attached is a list of more than 200 small and rural companies we represent in this matter.

We discussed the adverse public policy ramifications of adopting an impending order in the above-captioned proceeding and urged the Commissioner to consider forgoing adoption. In order to develop an appropriate record for adoption of access reform for the small and rural companies, the Commission should not adopt the proposed order, but instead issue an NPRM to allow the necessary discourse and study to take place regarding universal service, access and rate structures for the small and rural carriers. Adoption of the proposed order will not serve the interests of rural customers.

We discussed the potential increase in the Subscriber Line Charge (SLC) for rural telephone company customers. We recommended that the Commission not increase the SLCs at this time. We raised the need for understanding of the potential impact of the potential increases on universal service and the deployment of advanced services in the rural areas presently subject to rate of return regulation in contrast to those areas considered more market driven and served by carriers subject to price-cap incentive regulation.

Sincerely,



Stephen G. Kraskin

Cc: Commissioner Martin  
Samuel Feder

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**MEMBERS OF THE ALLIANCE OF  
INCUMBENT RURAL INDEPENDENT TELEPHONE COMPANIES**

**Accucom Telecommunications, Georgia  
Adams Telephone Cooperative, Illinois  
Albion Telephone Co. (ATC Communications), Idaho  
Alenco Communications, Inc., Texas  
Alpine Communications, Iowa  
Armstrong Telephone Company of Maryland  
Armstrong Telephone Company of New York  
Armstrong Telephone Company of Pennsylvania  
Armstrong Telephone Company of West Virginia  
Ballard Rural Telephone Cooperative Corporation, Inc., Kentucky  
Barry County Telephone Company, Michigan  
Bay Springs Telephone Co., Inc., Mississippi  
Bentleyville Communications Corporation, Pennsylvania  
Berkshire Telephone Company, New York  
Bixby Telephone Company, Oklahoma  
Brindlee Mountain Telephone Co., Inc., Alabama  
Bulloch Telephone Cooperative, Georgia  
Campti-Pleasant Hill Telephone Co., Louisiana  
Cap Rock Telephone Cooperative, Inc., Texas  
Cascade Utilities, Oregon  
Central Montana Communications, Inc., Montana  
Champlain Telephone Company, New York  
Citizens Telephone Company of Hammond, N.Y., Inc, New York  
Clear Lake Independent Telephone Company, Iowa  
Climax Telephone Co., Michigan  
Coalfields Telephone Company, Kentucky  
Coleman Coounty Telephone Cooperative, Texas  
Colorado Valley Telephone Cooperative, Inc., Texas  
Com South Telecommunications, Inc., Georgia  
Consolidated Telecom., North Dakota  
Copper Valley Telephone Company, Arizona  
Crockett Telephone Co., Inc., Tennessee  
Cumby Telephone Co-op, Texas  
Darien Telephone Company, Georgia  
Daviess Martin County Rural Telephone Corporation, Indiana  
Decatur Telephone Co., Mississippi  
The Deerfield Farmers' Telephone Company, Michigan  
Delhi Telephone Company, New York  
Delta Telephone Co., Inc., Mississippi  
Dunkirk & Fredonia Telephone Co., New York**



**Egyptian Telephone Cooperative Association, Illinois**  
**Ellijay Telephone Company, Georgia**  
**Empire Telephone Corporation, New York**  
**Fail Telecommunications Corporation, Mississippi and Georgia**  
**Farmers Telephone Cooperative, Inc., South Carolina**  
**Five Area Telephone Cooperative, Inc., Texas**  
**Flat Rock Telephone Co-operative, Illinois**  
**Franklin Telephone Co., Inc., Mississippi**  
**Gearheart Communications, Inc., Kentucky**  
**Georgetown Telephone Company, Mississippi**  
**Germantown Telephone Company, Inc., New York**  
**Gila River Telecommunications, Inc., Arizona**  
**Glenwood Telephone Company, Georgia**  
**Gridley Telephone Co., Illinois**  
**Hancock Telecom, Indiana**  
**Hardy Telecommunications, Inc., West Virginia**  
**Heart of Iowa Telecommunications Cooperative, Iowa**  
**Home Telephone Co., Illinois**  
**Hopper Telephone LLC, Alabama**  
**Horry Telephone Cooperative, Inc. South Carolina**  
**Lackawaxen Telephone Co., Pennsylvania**  
**LaFourche Telephone Company, Louisiana**  
**La Harpe Telephone Co., Inc., Illinois**  
**Lakeside Telephone Company, Mississippi**  
**Ligonier Telephone Co., Inc., Indiana**  
**Lincolnvile Telephone Company, Maine**  
**Mark Twain Rural Telephone Co., Missouri**  
**McDonough Telephone Cooperative, Illinois**  
**Mid Century Telephone Cooperative, Illinois**  
**Mid Maine Communications, Maine**  
**Mid-Missouri Telephone Company, Missouri**  
**Mid-Rivers Telephone Cooperative, Inc., Montana**  
**Midstate Telephone Company, North Dakota**  
**Minnesota Valley Telephone Co., Inc., Minnesota**  
**Modern Telecommunications Company, Missouri**  
**Moundville Telephone Company, Inc., Alabama**  
**Moundridge Telephone Company, Kansas**  
**Mulberry Cooperative Telephone, Indiana**  
**National Telephone Co. of Alabama, Inc., Alabama**  
**The Nebraska Central Telephone Company, Nebraska**  
**Nehalem Telephnoe and Telegraph Co., Oregon**  
**Nelson Telephone Cooperative, Wisconsin**  
**Nemont Telephone Cooperative, Montana**  
**New Paris Telephone Co., Indiana**  
**New Windsor Telephone Co., Inc., Illinois**



North Central Telephone Cooperative, Tennessee  
Northeast Missouri Rural Telephone Company, Missouri  
Northwest Communications Cooperative, North Dakota  
Nortex Communications, Texas  
Northeast Nebraska Telephone Company, Nebraska  
The North-Eastern Pa. Telephone Co., Pennsylvania  
North Pittsburgh Telephone Co., Pennsylvania  
Oneida County Telephone Company, New York  
Oneida Telephone Exchange & Cablevision, Inc., Illinois  
Ontario Telephone Co., New York  
Otelco Telephone LLC, Alabama  
Paul Bunyan Rural Telephone Cooperative, Minnesota  
PBT Telecom, Inc., South Carolina  
Peoples Telecommunications, Kansas  
Peoples Telephone Co., Inc., Tennessee  
Perry-Spencer Rural Telephone Cooperative, Inc., Indiana  
Piedmont Rural Telephone Cooperative, South Carolina  
Pioneer Telephone Cooperative, Oklahoma  
Pioneer Telephone Cooperative, Oregon  
Plant Telephone Company, Georgia  
Planters Rural Telephone Co-op, Georgia  
Poka Lambro Telephone Cooperative, Inc., Texas  
Preston Telephone Co., Iowa  
Progressive Rural Telephone Cooperative, Inc., Georgia  
Project Telephone Company, Montana  
Reynolds Telephone Company, Illinois  
Ringgold Telephone Company, Georgia  
Rio Virgin Telephone Company, Nevada  
Roanoke Telephone Co., Inc., Alabama  
Roosevelt County Rural Telephone Cooperative, New Mexico  
RT Communications, Wyoming  
Rye Telephone Company, Colorado  
Salina-Spavinaw Telephone Company, Inc., Oklahoma  
Sanborn Telephone Cooperative/Sancom, Inc., South Dakota  
San Carlos Apache Telecommunications Utility, Inc., Arizona  
Scio Mutual Telephone Association, Oregon  
Siskiyou Telephone, California  
Skyline Telephone Cooperative, North Carolina  
Sledge Telephone Co., Mississippi  
Smithville Telephone Company, Indiana  
Smithville Telephone Company, Mississippi  
South Central Utah Telephone Association, Inc., Utah  
South Park Telephone Co., Colorado  
South Plains Telephone Cooperative, Inc., Texas  
Southwest Texas Telephone Company, Texas



**Springport Telephone Co., Michigan**  
**Spruce Knob Seneca Rocks Telephone Co., West Virginia**  
**Stayton Cooperative Telephone Company, Oregon**  
**Taylor Telephone Cooperative, Texas**  
**Tidewater Telephone Company, Maine**  
**Tohono O'odham Utility Authority, Arizona**  
**Topsham Telephone Company, Inc., Vermont**  
**Trenton Telephone Company, Georgia**  
**Triangle Telephone Cooperative Association, Inc., Montana**  
**Trumansburg Telephone Co., New York**  
**Valley Telecommunications, Montana**  
**Valley Telephone Cooperative Arizona**  
**Valley Telephone Cooperative New Mexico**  
**Van Horne Co-op Telephone Co., Iowa**  
**Ventura Telephone Company, Iowa**  
**Viola Home Telephone Co., Illinois**  
**Waverly Hall Telephone, LLC, Georgia**  
**West Side Telephone Company, West Virginia**  
**West Tennessee Telephone Co., Inc., Tennessee**  
**Wilkes Telephone & Electric Company, Georgia**  
**Winnebago Cooperative Telephone Association, Iowa**  
**Winthrop Telephone Co., Inc., Minnesota**



# **Companies And Associations Supporting Plains Rural Independent Concerns and Positions**

## **Iowa**

- |                               |            |
|-------------------------------|------------|
| 1. Alpine Communications, LLC | Des Moines |
|-------------------------------|------------|

## **Kansas**

- |                                  |            |
|----------------------------------|------------|
| 1. Moundridge Telephone Co, Inc. | Moundridge |
|----------------------------------|------------|

## **Nebraska**

- |  |            |
|--|------------|
| 1. Cambridge Telephone Co.             | Cambridge  |
| 2. Clarks Telecommunications Co.       | Clarks     |
| 3. Consolidated Telephone Co.          | Lincoln    |
| 4. Curtis Telephone Co.                | Curtis     |
| 5. Great Plains Communications         | Blair      |
| 6. Hamilton Telecommunications         | Aurora     |
| 7. Hartington Telecommunications, Inc. | Hartington |
| 8. Hershey Cooperative Telephone Co.   | Hershey    |
| 9. Hooper Telephone Co.                | Remson, IA |
| 10. HunTel Systems, Inc.               | Blair      |
| 11. K&M Telephone Co.                  | Chambers   |
| 12. Nebraska Central Telephone Co.     | Gibbon     |
| 13. Northeast Nebraska Telephone Co.   | Jackson    |
| 14. Pierce Telephone Co., Inc.         | Pierce     |
| 15. Southeast Nebraska Telephone Co.   | Falls City |
| 16. Stanton Telecom, Inc.              | Stanton    |
| 17. Three River Telco                  | Lynch      |
| 18. Mainstay Communications            | Henderson  |

## **Oklahoma**

- |                            |          |
|----------------------------|----------|
| 1. Totah Telephone Co. Inc | Ochelata |
|----------------------------|----------|

## **South Dakota Telecommunications Association (Members Include)**

- |   |             |
|---|-------------|
| 1. Armour Independent Telephone Company           | Hartford    |
| 2. Baltic Telecom Cooperative                     | Baltic      |
| 3. Beresford Municipal Telephone Company          | Beresford   |
| 4. Bridgewater-Canistota Independent Telephone    | Hartford    |
| 5. Swiftel Communications                         | Brookings   |
| 6. Cheyenne River Sioux Tribe Telephone Authority | Eagle Butte |
| 7. Dakota Community Telephone                     | Irene       |
| 8. East Plains Telecom, Inc.                      | Baltic      |
| 9. Faith Municipal Telephone Company              | Faith       |
| 10. Fort Randall Telephone Company                | Wagner      |
| 11. Golden West Telecommunications Cooperative    | Wall        |
| 12. Interstate Telecommunications Cooperative     | Clear Lake  |
| 13. James Valley Telecommunications               | Groton      |
| 14. Long Lines                                    | Jefferson   |



15.	Kadoka Telephone Company	Kadoka
16.	Kennebec Telephone Company	Kennebec
17.	McCook Cooperative Telephone Company	Salem
18.	Midstate Communications	Kimball
19.	Mt. Rushmore Telephone Company	Keystone
20.	Roberts County Telephone Cooperative	New Effington
21.	RC Communications, Inc.	New Effington
22.	Santel Communications	Woonsocket
23.	Sioux Valley Telephone Company	Dell Rapids
24.	Splitrock Properties, Inc.	Brandon
25.	Splitrock Telecom Cooperative	Brandon
26.	Stockholm-Strandburg Telephone Company	Stockholm
27.	Sully Buttes Telephone Cooperative	Highmore
28.	Tri-County Telcom, Inc.	Emery
29.	Union Telephone Company	Hartford
30.	Valley Telecommunications Cooperative	Herreid
31.	West River Cooperative Telephone Company	Bison
32.	West River Telecommunications Cooperative	Mobridge
33.	Western Telephone Company	Faulkton